

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania

216 Haddon Avenue, Ste. 406

Westmont, NJ 08108

(215) 627-1322

Attorneys for CIT Bank, N.A., fka One West Bank, N.A., fka One West Bank, FSB

IN THE MATTER OF:

Bradley E. Boyle

Laurie S. Boyle

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 17-18935 JKS

**NOTICE OF MOTION FOR RELIEF  
FROM STAY**

TO:

Bradley E. Boyle  
57 Sleepy Hollow Road  
Andover, NJ 07821

Laurie S. Boyle  
57 Sleepy Hollow Road  
Andover, NJ 07821

Scott D. Sherman  
33 Clinton Road  
Suite 105  
West Caldwell, NJ 07006

Marie-Ann Greenberg  
30 Two Bridges Road; Suite 330 (VIA ECF)  
Fairfield, NJ 07004

Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **CIT Bank, N.A., fka One West Bank, N.A., fka One West Bank, FSB**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse, 50 Walnut Street; Newark, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **282 Wax Myrtle Trail, Southern Shores NC 27949**. The hearing on this matter is scheduled for **September 14, 2017 at 11:00**

AM.

Dated: August 23, 2017

**/s/Denise Carlon, Esq.**

Brian C. Nicholas, Esquire

Denise Carlon, Esquire

KML Law Group, P.C.

216 Haddon Avenue, Ste. 406

Westmont, NJ 08108

(215) 627-1322

dcarlon@kmlawgroup.com

Attorney for CIT Bank, N.A., fka One West Bank, N.A.,  
fka One West Bank, FSB